

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>CRIM. NO. 05-10188-MLW</b>
	)	
<b>RICHARD SHIPLEY,</b>	)	
<b>Defendant.</b>	)	

**GOVERNMENT'S MOTION TO DISMISS COUNTS THIRTEEN AND SIXTEEN**

In the interests of justice, the government hereby respectfully requests the Court to dismiss Counts Thirteen and Sixteen of the pending indictment. Specifically, Count Thirteen is dated January 22, 2005 and pertains to a check for \$2409.58. Count Sixteen is dated April 5, 2004 and pertains to a federal form known as a CA-7 signed by the defendant.

The defense does not oppose this request.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

Dated: February 10, 2006

By: /s/ Brian T. Kelly  
BRIAN T. KELLY  
SABITA SINGH  
Assistant U.S. Attorneys

**CERTIFICATE OF SERVICE**

I, Brian T. Kelly, Assistant United States Attorney, do hereby certify that this document, filed through the ECF (Electronic Case Filing) system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non registered participants on this date.

Dated: February 10, 2006

By: /s/ Brian T. Kelly  
BRIAN T. KELLY  
SABITA SINGH  
Assistant U.S. Attorneys